

1 ROGER I. TEICH
2 California State Bar No. 147076
3 290 Nevada Street
4 San Francisco, CA 94110
5 Telephone: (415) 948-0045
6 E-Mail Address: rteich@juno.com

7 ROBERT F. KENNEDY, JR.
8 MARY HOLLAND
9 Children's Health Defense
10 1227 North Peachtree Parkway, Suite 202
11 Peachtree City, GA 30269
12 Telephone: (917) 743-3868
13 E-Mail Address: mary.holland@childrenshealthdefense.org
14 (*Subject to pro hac vice admission*)

15 Attorneys for Plaintiff
16 CHILDREN'S HEALTH DEFENSE

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 CHILDREN'S HEALTH DEFENSE,

21 Plaintiff,

22 v.

23 FACEBOOK, INC., et al., ,

24 Defendants.

Case No. 20-cv-05787-SI

**DECLARATION OF RITA
SHREFFLER**

DECLARATION OF RITA SHREFFLER

I, Rita Shreffler, declare as follows:

1. I am the Director of Communications for Children’s Health Defense (“CHD”), which is the plaintiff organization in this action, *Children’s Health Defense v. Facebook, Inc., et al.*, 3:20-cv-05787-SI, currently pending in the United States District Court for the Northern District of California. This declaration is made in support of Plaintiff CHD’s Verified Second Amended Complaint. If called as a witness, I could and would testify competently to the facts herein, except as to those matters stated on information and belief.

2. Attached hereto as **Exhibit “A”** is a true and correct copy of a 9-page letter, dated March 4, 2019, from Ms. Lyn Redwood, RN, MSN, President, Children’s Health Defense, to Mr. Mark Zuckerberg, Chairman and Chief Executive Officer, Facebook Inc., 1 Hacker Way, Menlo Park, California 94025.

3. On November 3 through 7, 2020, I accessed CHD’s Facebook page at the following address: <https://www.facebook.com/ChildrensHealthDefense/>

4. Attached hereto as **Exhibit “B”** are true and correct screenshot or print-out copies of fifteen CHD articles which CHD posted to its Facebook page at the web address referenced in Paragraph 3, on various dates from on or about May 15, 2019 through September 28, 2020. Also attached (as applicable) are the corresponding Facebook “fact-check” articles which Facebook posted to CHD’s Facebook page at some date known with certainty only by Facebook, usually within several days, but in some cases weeks, after each of those CHD articles appeared. Also attached are true and correct copies of the rebuttal article by Dr. Brian

1 Hooker which CHD posted to its Facebook page, and the Facebook appeal letter of Dr.
2 Elizabeth Mumper.

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4 I declare under penalty of perjury under the laws of the United States that the foregoing
5 is true and correct to the best of my knowledge and that this declaration was executed in
6 Nixa, Missouri, on December 4, 2020.
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12 RITA SHREFFLER

13 Communications Director
14 Children's Health Defense
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